

**HIGH PRIORITY VIOLATION (HPV) IDENTIFICATION CHECKLIST**

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Company Name: VACUMET CORP. Company Number: 32-0169

Emission Point Numbers Involved: \_\_\_\_\_

**Applicability:** Before examining the General HPV Criteria OR the Matrix Criteria to identify whether a violation is an HPV, determine whether the HPV Policy applies to the particular violation. The HPV Policy will only apply if the pollutant at issue is one for which the source is considered major or conditional major. If this condition is not satisfied, the violation is not an HPV based on the HPV Criteria.

**HPV GENERAL CRITERIA**

(Remember the violation, for example, building/modification without a permit, must involve the pollutant for which the source is considered Major).

<u>Criterion No.</u>	<u>Description</u>	<u>HPV?</u>	
GC1	Failure to Obtain PSD or NSR Permit.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
GC2	Violation of Air Toxics Requirements.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
GC3	Violation that Affects Synthetic Minor (Conditional Major) Status.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
GC4	Enforcement Violation	Yes <input type="checkbox"/>	No <input type="checkbox"/>
GC5	Title V Certification Violation.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
GC6	Title V Permit Application Violation.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
GC7	Testing, Monitoring, Recordkeeping, or Reporting Violation.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
GC8	Emission Violation.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
GC9	Chronic or Recalcitrant Violation	Yes <input type="checkbox"/>	No <input type="checkbox"/>
GC10	Section 112(r) Violation.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

( NOTE: Refer to Chapter 1200-3-32 for the Division's limited involvement in this Federal Program).

**HPV MATRIX CRITERIA**

<u>Criterion No.</u>	<u>Description</u>	<u>HPV?</u>	
M1A	Emission Violation Detected by Stack Test.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M1B	Violation of emission limits >15%	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
M1C	Violation of emission limits >the Supplement Significant Threshold	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M2A	Direct Surrogate Violation >5% of limit for >3% of operating time	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M2B	Direct Surrogate Violation >50% of operating time	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M2C	Direct Surrogate Violation >25% of operating time for 2 reporting periods	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M3A	CEM Detected Violation >15% of limit for >5% of operating time	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M3B	CEM Detected Violation >Supplemental Significant Threshold	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

# HPV IDENTIFICATION CHECKLIST (Continued)

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M3C	CEM Detected Violation >15% for 2 reporting periods	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M3D	CEM Detected Violation >50% of operating time	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M3E	CEM Detected Violation >25% for 2 reporting periods	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M3F	CEM Detected Violation for any violation of > 24 hour standard	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M4A	Opacity Violation via COM, 0-20% opacity standard, >5% opacity for >5% of operating time	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M4B	Opacity Violation via COM, 0-20% opacity standard, >5% opacity for >3% of operating time for 2 consecutive reporting periods	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M4C	Opacity Violation via COM, >20% opacity standard, >10% opacity for 5% of operating time	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M4D	Opacity Violation via COM, >20% opacity standard, >10% opacity for 3% of operating time for 2 consecutive reporting periods	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M4E	Opacity Violation via Method 9, 0-20% opacity standard, VEE >50% over limit	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
M4F	Opacity Violation via Method 9, >20% opacity standard, VEE >25% over limit	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
DIS	Discretionary HPV	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

NOTE: Regardless of whether you determined the violation to be an HPV or not an HPV, attach to this checklist, copies of all calculations (not conducted below) and relevant documentation in support of your determination.

$$\begin{aligned}
 &3.37 \text{ lb/gal} \times 2.9 \text{ lb/gal} = 0.47 \\
 &0.47 \times 100 = 16.20\% \text{ exceeding limit.} \\
 &2.9 \\
 &\text{this is an HPV.}
 \end{aligned}$$

## DATES, SIGNATURES, AND ROUTING TO BE COMPLETED BY THE IDENTIFIER

Violation Discovery Date: 0019, 2009 NOV Date: March 3, 2010  
Method of Discovery: FF Pollutant of Concern: VOC

Time to complete HPV Determination: \_\_\_\_\_

NOTE: It is important to record an accurate discovery date. That is defined as the date the violation is first discovered, date report submitted, inspection, etc. If, for example, a semiannual report or an application is involved, the day of discovery **WILL BE** the date the Division received the report or application, **NOT** the date of the report or application review.

Check one ☒ This NOV is a HPV. (If HPV complete the following line)  
based on General Criterion No. \_\_\_\_\_ or Matrix Criterion No. \_\_\_\_\_  
☐ This NOV is not a HPV.

Identifier's Name: Sunanda Shajikumar Date: 11/4/10

Upload to the database.